

1 NINA F. LOCKER, State Bar No. 123838
Email: nlocker@wsgr.com
2 RODNEY G. STRICKLAND, JR., State Bar No. 161934
Email: rstrickland@wsgr.com
3 JONI L. OSTLER, State Bar No. 230009
Email: jostler@wsgr.com
4 MERAV AVITAL-MAGEN, State Bar No. 236144
Email: mmagen@wsgr.com
5 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
6 650 Page Mill Road
Palo Alto, CA 94304-1050
7 Telephone: (650) 493-9300
Facsimile: (650) 565-5100

8 Attorneys for Defendants
9 ALVARION LTD., ZVI SLONIMSKY,
10 TZVI FRIEDMAN, AND DAFNA GRUBER

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION
14

15 AMNON MEIR, On Behalf of Himself and All
Others Similarly Situated,

16 Plaintiff,

17 vs.

18 ALVARION LTD., ZVI SLONIMSKY,
19 DAFNA GRUBER AND MEIR BAREL,

20 Defendants.
21

CASE NO.: C 07-0374 JSW

22 **STIPULATION AND ~~PROPOSED~~**
ORDER CONSOLIDATING CASES
AND CONTINUING CASE
MANAGEMENT CONFERENCE

CMC Date: September 21, 2007
Time: 1:30 p.m.
Courtroom: 2
Before: Hon. Jeffrey S. White

23 MANFRED HACKER, On Behalf of Himself
and All Others Similarly Situated,

24 Plaintiff,

25 vs.

26 ALVARION LTD, ZVI SLONIMSKY,
27 DAFNA GRUBER AND MEIR BAREL,

28 Defendants.

Case No. 07-00719-JSW

STIP AND ~~PROPOSED~~ ORDER CONSOLIDATING
CASES AND CONTINUING CMC
No. C-07-0374-JSW; NO. C-07-00719-JSW; AND NO C-07-
02602-JSW

IRVING BRAUN, On Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

vs.

ALVARION LTD., ZVI SLONIMSKY, TZVI
FRIEDMAN AND DAFNA GRUBER,

Defendants.

Case No. 07-02602-JSW

1 WHEREAS, each of the above-captioned cases is a purported class action governed by
2 the provisions of the Private Securities Litigation Reform Act of 1995 (“PSLRA”);

3 WHEREAS, the three above-captioned substantially similar class actions have all been
4 deemed related, along with a fourth class action titled *Berger v. Alvarion, Ltd., et al.*, Case No. C
5 07-02601-JSW, (*see* Docket for *Meir v. Alvarion Ltd., et al.*, Case No. C 07-00374-JSW (“*Meir*
6 Docket”) No. 62);

7 WHEREAS, on April 9, 2007, three motions to consolidate all four actions and for
8 appointment as Lead Plaintiff pursuant to Section 21(D) of the PSLRA were filed in the first-
9 filed *Meir* case (*Meir* Docket Nos. 15, 17 and 21);

10 WHEREAS, on August 14, 2007, Rahul Saraf and the Harel Group, which consists of the
11 Harel Insurance Company Ltd., filed a Stipulation re Appointment of Lead Plaintiffs and Lead
12 Counsel (*Meir* Docket No. 51), in which two of the lead plaintiff movants requested
13 consolidation of the four class actions and agreed to serve as Co-Lead Plaintiffs in this action;¹

14 WHEREAS, on September 20, 2007, plaintiff Paul Berger filed a Notice of Voluntary
15 Dismissal of his separate action, *Berger v. Alvarion Ltd., et al.* (Case No. C 07-02601-JSW);

16 WHEREAS, all named plaintiffs in each of the above three remaining related cases agree
17 that the cases should be consolidated, and defendants Alvarion Ltd., Zvi Slonimsky, Tvzi
18 Friedman and Dafna Gruber likewise agree that these three remaining cases should be
19 consolidated (*see* Stipulation re Appointment of Lead Plaintiffs and Lead Counsel, *Meir* Docket
20 No. 51; and Defendants’ Joinder in Plaintiffs’ Request for Consolidation, filed September 4,
21 2007, *Meir* Docket No. 63);

22 WHEREAS, the three cases are scheduled for Case Management Conferences (“CMCs”)
23 on September 21, 2007 at 1:30 p.m., but no lead plaintiff has been appointed who can speak for
24 the plaintiff class, and thus all the parties agree that the CMCs would be premature at this time;

25
26 ¹ On September 20, 2007, movant Harel Insurance Co. Ltd. withdrew its application to be
27 appointed lead plaintiff. *See* Notice of Withdrawal, filed September 20, 2007, *Meir* Docket No.
28 71. However, the remaining signatories to this stipulation, movants Saraf and Khan, continue to
seek appointment as co-lead plaintiffs. *See id.*

IT IS HEREBY STIPULATED AND AGREED, by (a) Defendants Alvarion, Zvi Slonimsky, Tvzi Friedman and Dafna Gruber, by and through their counsel, (b) plaintiff Amnon Meir, by and through his counsel (c) plaintiff Manfred Hacker, by and through his counsel, and (d) plaintiff Irving Braun, by and through his counsel, that:

(1) The three above-captioned related cases should be consolidated under the above-captioned *Meir v. Alvarion Ltd., et al.* case (Case No. C 07-00374-JSW);

(2) The Case Management Conference currently scheduled for September 21, 2007, at 1:30 p.m. should be taken off calendar and rescheduled at another time convenient for the Court after a lead plaintiff has been appointed who can speak for the plaintiff class.

Dated: September 20, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Joni Ostler
Joni Ostler

Attorneys for Defendants Alvarion Ltd., Zvi
Slonimsky, Tzvi Friedman and Dafna Gruber

Dated: September 20, 2007

GLANCY BINKOW & GOLDBERG LLP

By: /s/ Andy Sohrn
Andy Sohrn

Attorneys for Plaintiffs Amnon Meir and the Harel
Group

Dated: September 20, 2007

SCOTT + SCOTT, LLC

By: /s/ Arthur L. Shingler, III
Arthur L. Shingler, III

Attorneys for Plaintiff Manfred Hacker

Dated: September 20, 2007

COUGHLIN STOIA GELLER RUDMAN
ROBBINS LLP

By: /s/ Mario Alba
Mario Alba

Attorneys for Plaintiff Irving Braun

ORDER

Pursuant to Stipulation, it is hereby ordered that:

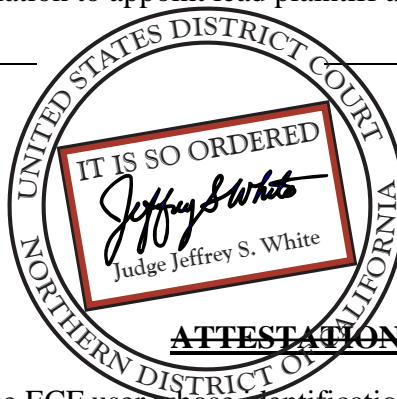
(1) The three related cases titled *Meir v. Alvarion Ltd., et al.*, Case No. C 07-00374-JSW; *Hacker v. Alvarion Ltd., et al.*, Case No. C 07-00374-JSW; and *Braun v. Alvarion Ltd. et al.*, Case No. C 07-02602-JSW, are all consolidated under the first-filed *Meir v. Alvarion Ltd., et al.* case;

(2) The Case Management Conference currently scheduled for September 21, 2007, should be taken off calendar and rescheduled for November 9, 2007 at 1:30 p.m. Plaintiffs. Shall file a motion or stipulation to appoint lead plaintiff and lead counsel by no later than October 12, 2007.

Dated: _____

~~The Honorable Jeffrey S. White~~
~~United States District Court Judge~~

Dated: September 20, 2007



ATTESTATION

I, Joni Ostler, am the ECF user whose identification and password are being used to file the STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES AND CONTINUING CASE MANAGEMENT CONFERENCE. In compliance with General Order 45.X.B, I hereby attest that Andy Sohrn; Arthur L. Shingler, III; and Mario Alba have each concurred in this filing.

Dated: September 20, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Joni Ostler
Joni Ostler